

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVONNA JAMES, individually and on behalf
of all others similarly situated,

Plaintiff,

Case No.: 1:21-cv-06544

-against-

COHNREZNICK LLP,

Defendant.

PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT

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Plaintiff Davonna James, individually and on behalf of others similarly situated (“Plaintiff”), hereby move this Court to:

1. Preliminarily approve the settlement described in the “Settlement Agreement” between Plaintiff and Defendant CohnReznick, LLP. (“Defendant”), and the attachments thereto, including the Claim Form, Short Form Notice, Long Form Notice, the Proposed Preliminary Approval Order, and the Proposed Final Approval Order, attached to the Declaration of David Lietz, filed herewith in support of this motion;
2. Conditionally certify the Settlement Class;
3. Appoint Plaintiff Davonna James as Class Representatives;
4. Appoint David Lietz and Danielle L. Perry of Mason Klinger & Lietz LLP and M. Andersen Berry of Clayeo C. Arnold, a Professional Law Corp as Class Counsel;

5. Approve a customary short form notice to be mailed to Settlement Class Members (the “Short Notice”) in a form substantially similar to that attached as Exhibit B to the Settlement Agreement;

6. Approve a customary long form notice (“Long Notice”) to be posted on the settlement website in a form substantially similar to the one attached as Exhibit C to the Settlement Agreement;

7. Direct notice to be sent to the Settlement Class in the form and manner proposed as set forth in the Settlement Agreement and Exhibits B and C thereto;

8. Appoint Postlethwaite & Netterville (“P&N”) as Notice Specialist and Claims Administrator;

9. Approve the use of a claim form (“Claim Form”) substantially similar to that attached as Exhibit A to the Settlement Agreement; and

10. Set a hearing date and schedule for final approval of the Settlement and consideration of Settlement Class Counsel’s motion for award of fees, costs, expenses, and service awards.

This Motion is based upon: (1) this Motion; (2) the Memorandum of Points and Authorities in Support of this Motion, filed herewith; (3) the Declaration of David Lietz, filed herewith; (4) the Settlement Agreement; (5) the Notices of Class Action Settlement (including the Short Form Notices and Long Form Notice); (6) the Claim Form; (7) the [Proposed] Order Granting Preliminary Approval of Class Action Settlement; (8) the [Proposed] Final Approval Order; (9) the records, pleadings, and papers filed in this action; and (10) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: March 4, 2022

Respectfully submitted,

/s/ David K. Lietz

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**Admission pro hac vice pending*